

Presentment Date and Time: September 15, 2008 at 12:00 p.m. (prevailing Eastern Time)
Objection Deadline: September 15, 2008 at 11:30 a.m. (prevailing Eastern Time)

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Richard P. Krasnow

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
In re	:	Chapter 11 Case No.
	:	
LEXINGTON PRECISION CORP., <u>et al.</u> ,	:	08-11153 (MG)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

**NOTICE OF PRESENTMENT OF STIPULATION AND AGREED
ORDER BETWEEN DEBTORS AND THE PREPETITION SENIOR
LENDERS DEEMING CLAIMS TIMELY FILED**

PLEASE TAKE NOTICE that the undersigned will present the annexed proposed Stipulation and Agreed Order (the “Proposed Stipulation”) between Lexington Precision Corporation and Lexington Rubber Group, Inc., as debtors and debtors in possession (collectively, the “Debtors”) and CapitalSource Finance LLC, as Revolver Agent to the Prepetition Revolver Lenders and CSE Mortgage LLC, as Term Loan Agent to the Senior Term Loan Lenders (collectively, the “Agents”) to the Honorable Martin Glenn, United States Bankruptcy Judge, for signature on **September 15, 2008 at 12:00 p.m. (prevailing Eastern time)**.

PLEASE TAKE FURTHER NOTICE that any objections or responses to the Proposed Stipulation, if any, must (a) be in writing; (b) conform to the Federal Rules of

Bankruptcy Procedure and the Local Rules for the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court"); and (c) set forth the name of the objecting party, the basis for the objection, and the specific grounds therefore. Any objections or responses must be filed with the Bankruptcy Court no later than **September 15, 2008 at 11:30 a.m. (prevailing Eastern Time)**. In accordance with General Order M-242, registered users of the Bankruptcy Court's case filing system must file their objections and responses electronically. General Order M-242 may be found at www.nysb.uscourts.gov. All other parties-in-interest must file their objections and responses on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format) and deliver a hard copy directly to the chambers of Judge Martin Glenn.

PLEASE TAKE FURTHER NOTICE that all objections and responses must be served so as to be received no later than **September 15, 2008, at 11:30 a.m. (prevailing Eastern Time)**, upon: (a) the Debtors, Lexington Precision Corporation, 800 Third Ave. 15th Floor, New York, New York 10023 (Attn: Michael A. Lubin), (b) the attorneys for the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Richard P. Krasnow and Victoria Vron); (c) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Paul Schwartzberg); (d) the attorneys for the Agents, Waller, Landsden, Dortch & Davis LLP, 511 Union Street, Suite 2700, Nashville, Tennessee, 37219 (Attn: John C. Tishler); (e) the attorneys for the official creditors' committee of unsecured creditors, Andrews Kurth LLP, 450 Lexington Avenue, New York, New York 10017 (Attn: Paul Silverstein); and (f) the attorneys for Debtors' postpetition lenders, O'Melveny & Meyers, LLP, Times Square Tower, 7 Times Square, New York, New York 10036 (Attn: Gerald Bender).

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, a hearing will be held at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, at a date and time to be established by the Court. The moving and objecting parties are required to attend the hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: September 5, 2008
New York, New York

/s/ Richard P. Krasnow
Richard P. Krasnow
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
In re	:	Chapter 11 Case No.
	:	
LEXINGTON PRECISION CORP., <u>et al.</u> ,	:	08-11153 (MG)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

**STIPULATION AND AGREED ORDER BETWEEN DEBTORS AND THE
PREPETITION SENIOR LENDERS DEEMING CLAIMS TIMELY FILED**

By and through the undersigned attorneys, Lexington Precision Corporation and Lexington Rubber Group, Inc., as debtors and debtors in possession (collectively, the “Debtors”) and CapitalSource Finance LLC, as Revolver Agent¹ to the Prepetition Revolver Lenders and CSE Mortgage LLC, as Term Loan Agent to the Senior Term Loan Lenders (collectively, the “Parties”), hereby agree and stipulate to the following matters:

RECITALS:

A. On June 30, this Court entered that certain Order Pursuant to Bankruptcy Rules 2002(A)(7), (F), and (L) and 3003(C)(3) and Section 502(B)(9) of the Bankruptcy Code Establishing Deadlines for Filing Proofs of Claim and Approving the Form and Manner of Notice Thereof (the “Bar Date Order”), which required proofs of claim to be delivered to the Debtors’ claims processing agent prior to 5:00 p.m. (eastern time) on Friday August 15, 2008, at the following address: Lexington Precision Claims Processing Center, c/o Epiq Bankruptcy Solutions, LLC, 757 3rd Avenue, 3rd Floor, New York, New York 10017 (the “Claims Address”).

¹ Capitalized terms not defined herein shall have the meaning ascribed to them in that certain Final Order Pursuant to Bankruptcy Code Sections 105, 361, 362, 363, 364 (I) Authorizing Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Lenders, and (III) Authorizing Postpetition Financing, dated April 17, 2008 [Docket No. 61].

B. Pursuant to the Prepetition Senior Lender Loan Documents, the Agents are vested with the authority to act on behalf of the Prepetition Senior Lenders. On August 13, 2008, the following proofs of claim, with original signatures (collectively, the “Claims”), were submitted by the Agents for shipment by overnight delivery via Federal Express to the Claims Address, proof of which is attached hereto as Exhibit A:

(i) Prepetition Revolver Lenders’ claim against Debtor Lexington Precision Corp. (Case No. 08-11153) submitted by the Revolver Agent;

(ii) Prepetition Revolver Lenders’ claim against Debtor Lexington Rubber Group, Inc. (Case No. 08-11156) submitted by the Revolver Agent;

(iii) Claim of CSE Mortgage LLC (“CSE”), as a lender, and DMD Special Situations Funding LLC, (“DMD”), as a lender (DMD and CSE, as lenders, the “Prepetition Term Lenders”) against Lexington Precision Corp. (Case No. 08-11153) submitted by the Term Loan Agent; and

(iv) Prepetition Term Lenders’ claim against Lexington Rubber Group, Inc. (Case No. 08-11156) submitted by the Term Loan Agent.

C. In addition, on August 14, 2008, counsel to the Agents also forwarded pdf scans of the Claims to counsel to the Debtors.

D. The Agents subsequently became aware that shipment of the original Claims, despite proper addressing of the package by the Agents to the Claims Address, was not completed by Federal Express. Upon learning that the shipment was not delivered, counsel to the Agents immediately informed counsel to the Debtors of the delivery failure and sought confirmation of where to submit the Claims.

E. As instructed by the Debtors, the Agents resubmitted the Claims for delivery to the Claims Address, proof of which is attached hereto as Exhibit B.

F. The parties determined to enter into this stipulation to avoid litigation costs regarding the timeliness of the filing of the Claims.

AGREEMENT:

1. The Claims of the Prepetition Senior Lenders are hereby deemed timely filed in compliance with the Bar Date Order, and the Claims shall not be subject to any objection by the Debtors or any party in interest on the basis that they were not timely filed.

Dated: September 4, 2008
New York, New York

WEIL, GOTSHAL & MANGES LLP

/s/ Richard P. Krasnow

Richard P. Krasnow
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for the Debtors and Debtors in Possession

WALLER LANSDEN DORTCH &
DAVIS LLP

/s/ Robert J. Welhoelter

John C. Tishler
Robert J. Welhoelter
511 Union Street, Suite 2700
Nashville, Tennessee 37219-8966
Telephone: (615) 244-6380
Fax: (615) 244-6804

and

CARTER LEDYARD & MILBURN LLP

/s/ Aaron R. Cahn

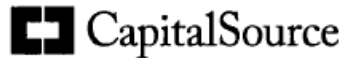
Aaron R. Cahn
2 Wall Street
New York, New York 10005
TEL: (212) 238-8629
FAX: (212) 732-3232

Attorneys for the Agents

SO ORDERED, this
____ day of September, 2008

UNITED STATES BANKRUPTCY JUDGE

Exhibit A



4445 Willard Avenue
Twelfth Floor
Chevy Chase, MD 20815
tel: 301.841.2700
capitalsource.com

ANGELA DISOMMA
Paralegal – Restructuring Group
direct: 301.634.6756 | fax: 301.841.2380
adisomma@capitalsource.com

August 13, 2008

VIA FEDERAL EXPRESS

Lexington Precision Claims Processing Center
c/o Epiq Bankruptcy Solutions, LLC
757 3rd Avenue, 3rd Floor
New York, New York 10017

Re: Lexington Precision Corporation/Lexington Rubber Group, Inc. - Chapter 11

To Whom It May Concern::

Attached please find the following Proofs of Claim:

Debtor: Lexington Precision Corporation; Creditor: Capitalsource Finance LLC - Case No. 08-11156;
Debtor: Lexington Rubber Group, Inc.; Creditor: CSE Mortgage LLC - Case No. 08-11156;
Debtor: Lexington Precision Corporation; Creditor: Capitalsource Finance LLC - Case No. 08-11153; and
Debtor: Lexington Rubber Group, Inc.; Creditor: CSE Mortgage LLC - Case No. 08-11156

Should you have any questions, please do not hesitate to contact me at (301) 634-6756.

Sincerely,

A handwritten signature in black ink, appearing to read 'Angela DiSomma', written over the typed name.

Angela DiSomma
Paralegal

Enclosures

Page 1 of 1

From: Origin ID: GAIA (301)634-6756
Angela DiSomma
CapitalSource
4445 Willard Avenue
12th Floor
Chevy Chase, MD 20815



CLW538662906

SHIP TO: 301-634-6779 BILL SENDER
c/o Epiq Bankruptcy Solutions, LLC
Lexington Precision Claims Prcsng
757 3rd Avenue, 3rd Floor

New York, NY 10017

Ship Date: 13AUG08
ActWgt: 5 LB
System#: 4016892/NET8061
Account#: S *****

Delivery Address Bar Code

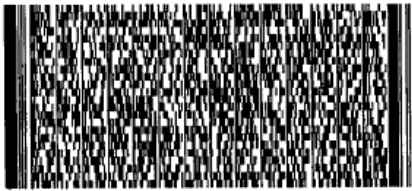


Ref # Lexington Precision
Invoice #
PO #
Dept #

RELEASE#: 3785346

TRK# 7984 9567 6386
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Account: S 131047207

TO ATT: RETURNS; ANGELA DISOMMA
CAPITALSOURCE
4445 WILLARD AVE.
12TH FLR.
CHEVY CHASE, MD 20815

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		Weight	5.0 lbs.
Status	Delivery exception		
Date/Time	Activity	Location	Details
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	8:08 AM Delivery exception	NEW YORK, NY	
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	5:38 AM Departed FedEx location	NEWARK, NJ	
	12:01 AM Arrived at FedEx location	NEWARK, NJ	
Aug 13, 2008	9:17 PM Left FedEx origin facility	ROCKVILLE, MD	
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	3:56 PM Package data transmitted to FedEx		

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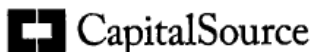
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Exhibit B



4445 Willard Avenue
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Chevy Chase, MD 20815
tel: 301.841.2700
capitalsource.com

ANGELA DISOMMA
Paralegal - Restructuring Group
direct: 301.634.6756 | fax: 301.841.2380
adisomma@capitalsource.com

~~August 13, 2008~~ Resending August 27, 2008

VIA FEDERAL EXPRESS

Lexington Precision Claims Processing Center
c/o Epiq Bankruptcy Solutions, LLC
757 3rd Avenue, 3rd Floor
New York, New York 10017

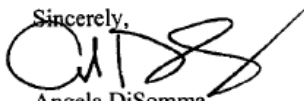
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Debtor: Lexington Precision Corporation; Creditor: Capitalsource Finance LLC - Case No. 08-11153; and
Debtor: Lexington Rubber Group, Inc.; Creditor: CSE Mortgage LLC - Case No. 08-11156

Should you have any questions, please do not hesitate to contact me at (301) 634-6756.

Sincerely,

Angela DiSomma
Paralegal

Enclosures

Page 1 of 1

From: Origin ID: GAIA (301)834-6756
Angela DiSomma
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4445 Willard Avenue
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Chevy Chase, MD 20815



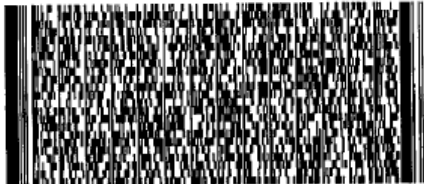
SHIP TO: (646) 282-2500 **BILL SENDER**
Lexington Precision Claims Prcsng
c/o Epiq Bankruptcy Solutions LLC
757 3rd Avenue
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New York, NY 10017

Ship Date: 27AUG08
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System#: 2939650/NET8061
Account#: S *****

Delivery Address Bar Code



Ref # Lexington Precision
Invoice #
PO #
Dept # 4

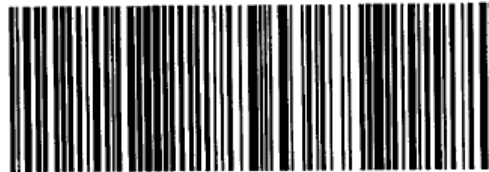


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Delivery date Aug 28, 2008 2:02 PM

Reference Lexington Precision
Department number 4
Destination New York, NY
Delivered to Mailroom
Service type Standard Box
Weight 10.0 lbs.

Status Delivered

Signature image available [Yes](#)

Date/Time	Activity	Location	Details
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	12:30 AM	Arrived at FedEx location	NEWARK, NJ
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